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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Rajeer Pahuja

(In the space above enter the full name(s) of the plaintiff(s)/petitioner(s).)

-against-

American University of Antigua,  
c/o Greater Caribbean Learning  
Resources.

(In the space above enter the full name(s) of the defendant(s)/respondent(s).)

**APPLICATION FOR THE  
COURT TO REQUEST  
PRO BONO COUNSEL**

I, Rajeer Pahuja, (print or type your name) am a party in this case and cannot afford an attorney. I ask the Court to request *pro bono* counsel to represent me in this action. I understand that even if the Court grants this application, I will receive *pro bono* counsel only if an attorney through Court's *Pro Bono* Program volunteers to take my case and that there is no guarantee that an attorney will volunteer to represent me.

1. In support of my application, I provide the following information: (Use additional paper if necessary.)

A. Have you asked the Court to request *pro bono* counsel in this case before? If yes, when were your prior applications filed and what has changed in the status of your case since you last asked the Court to request *pro bono* counsel?

Yes I have asked the court to request  
pro bono counsel in this case before. The  
request was respectfully denied. I am respectfully  
requesting if an pro bono counsel can be granted  
based on me having a severe medical condition (attention  
deficit disorder and a Hindi English language problem.

B. Requests for *pro bono* counsel are rarely granted at the early stages of a case and usually not before the Court has issued a decision on the merits of the case. What has happened in your case that demonstrates the potential merit of your case?

I suffer from a severe learning disability  
(attention deficit disorder) and based on my  
medical condition do lose my train of thought  
based on my Hindi English language problem.

C. Explain why you need an attorney in this case.

I have Due to Hurricane Irene and Autumn Norcoaster I have lost power and electricity, has had a ~~surge~~ <sup>lens insensitivity</sup> with not medically feeling well having <sup>lens insensitivity</sup> attention deficit disorder as well with the Hindi English language problem.

D. Explain what steps you have taken to find an attorney and with what results.

*(Please identify the lawyers, law firms or legal clinics you have contacted and their responses to your requests. If you have limited access to the telephone, mail, or other communication methods, or if you otherwise have had difficulty contacting attorneys, please explain.)*

I have made every attempt to find an attorney and I have a complete record of it.

E. If you need an attorney who speaks a language other than English, state what language(s) you speak:

Speak Hindi Fluently and there is English-Hindi language problem.

2. In further support of my application, I declare that (check appropriate box):

I have previously filed a Request to Proceed *In Forma Pauperis* in this case, and it is a true and correct representation of my current financial status.

I have not previously filed a Request to Proceed *In Forma Pauperis* in this case, and now attach an original Request to Proceed *In Forma Pauperis* detailing my financial status.

I have previously filed a Request to Proceed *In Forma Pauperis* in this case, however, my financial status has changed. I have attached another Request to Proceed *In Forma Pauperis* showing my current financial status.

3. I understand that if an attorney volunteers to represent me and that attorney learns that I can afford to pay for an attorney, the attorney may give this information to the Court.

4. I understand that if my answers on this application are false, my case may be dismissed.

5. **I declare under penalty of perjury that the foregoing is true and correct.**

Dated: 11/23/2011

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Signature

11/23/2011

Honorable Judge Englemayer  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 230  
New York, NY 10007

Dear Judge Englemayer:

I am refiling for Pro Bono Counsel at this present time based on losing power and electricity during Hurricane Irene and Autumn Nor'easter. Based on my medical condition (Attention Deficit Disorder ~~and respectfully requesting if~~ <sup>(Attention</sup> ~~a~~ <sup>and respectfully requesting if</sup> pro bono counsel can be assigned to my case.

Enclosed is the <sup>refile of the</sup> application regarding Pro Bono (Volunteer Counsel) for your review.

Very Truly Yours,

Rejeer Pahujis